

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

COBBLESTONE WIRELESS, LLC,

Plaintiff,

V.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA,
INC.;

Defendants.

Case No. 2:23-cv-00285-JRG-RSP

**PLAINTIFF’S UNOPPOSED MOTION TO WITHDRAW
ITS MOTION TO COMPEL (DKT. 52)**

Plaintiff Cobblestone respectfully moves to withdraw its Motion to Compel Production of All Discovery Withheld Pending MOTIE Review, Dkt. 52. After the motion was filed, Defendants’ counsel have provided the following assurances without agreeing that the motion was properly brought:

1. On May 5, 2024, Defendants’ counsel wrote, “MOTIE approved Samsung’s application this week.”
2. On May 9, 2024, Defendants’ counsel wrote, “Samsung is producing source code in this case by making it available for inspection starting on May 14, 2024”
3. On May 10, 2024, Defendants’ counsel wrote, “confirmed – all responsive technical documents have been produced, and all source code that was subject to MOTIE approval is being loaded onto a source code computer.”

4. On May 10, 2024, Defendants' counsel responded "No," in response to the question, "Are there any other documents, code, or other discovery materials still pending MOTIE review?"
5. On May 15, 2024, Defendants' counsel wrote, "we can commit to supplementing Samsung's response to Interrogatory No. 6 by June 7."

Thus, all relief sought in Plaintiff's Motion to Compel is now moot. Plaintiff moves with withdraw its motion to compel, reserving the right to re-raise the issue and seek expedited briefing if MOTIE-related production is found later to be incomplete.

Dated: May 15, 2024

Respectfully submitted,

/s/ Reza Mirzaie

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***ATTORNEYS FOR PLAINTIFF,
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CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2024, I electronically filed the foregoing document with the Clerk of the Court for the Eastern District of Texas using the ECF System, and served defendants with a copy via electronic mail.

/s/ Reza Mirzaie

Reza Mirzaie

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Plaintiff has confirmed with counsel for Defendants that the relief sought herein is unopposed.

/s/ Reza Mirzaie

Reza Mirzaie